

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

03-MDL-1570 (GBD)(SN)

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**IRAN NOTICE OF
AMENDMENT**

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN) .

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Angelini, Anne	NY	USA	Angelini, Sr., Joseph J.	Spouse	N/A
2	Apostol, Justin	NY	USA	Apostol, Jr., Faustino	Child	N/A
3	Apostol, Kathleen	NY	USA	Apostol, Jr., Faustino	Spouse	N/A
4	Kelly, Caroline	NY	USA	Kelly, Joseph A.	Child	N/A
5	Kelly, Catherine	NY	USA	Kelly, Joseph A.	Child	N/A
6	Kelly, Christopher	NY	USA	Kelly, Joseph A.	Child	N/A
7	Kelly, Susan	NY	USA	Kelly, Joseph A.	Spouse	N/A
8	Kelly, Susan	NY	USA	Kelly, Joseph A.	Parent and legal guardian on behalf of T.K., minor child of 9/11 Decedent Joseph A. Kelly	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
9	Kelly, Thomas	NY	USA	Kelly, Joseph A.	Child	N/A
10	Nelson, David Dwight	CT	USA	Gordon, Kerene	Child	N/A
11	Nelson, Delroy	n/a	Canadian	Gordon, Kerene	Child	N/A
12	O'Hagan, Andrea	NY	USA	O'Hagan, Thomas G.	Spouse	N/A
13	O'Hagan, Patrick	NY	USA	O'Hagan, Thomas G.	Child	N/A
14	O'Hagan, Pierce	NY	USA	O'Hagan, Thomas G.	Child	N/A
15	Olson, Christopher Ake	NY	USA	Olson, Maureen L.	Child	N/A
16	Olson, John Eric	NY	USA	Olson, Maureen L.	Spouse	N/A
17	Olson, Maeve Elizabeth	NY	USA	Olson, Maureen L.	Child	N/A
18	Tumulty, Sara	NJ	USA	Tumulty, Lance	Child	N/A
19	Tumulty- Ollerman, Cynthia	NJ	USA	Tumulty, Lance	Spouse	N/A
20	Tumulty- Ollerman, Cynthia	NJ	USA	Tumulty, Lance	Parent and legal guardian on behalf of C.T., minor child of 9/11 Decedent Lance Tumulty	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
21	Williams, Darren	CA	USA	Williams, Debbie L.	Spouse	N/A
22	Williams, Payton	CA	USA	Williams, Debbie L.	Child	N/A
23	Zois, Dorota	NY	USA	Zois, Prokopios	Spouse	N/A
24	Zois, Theofanis	NY	USA	Zois, Prokopios	Child	N/A
25	Zois-Geol, Stefania	NY	USA	Zois, Prokopios	Child	N/A

Dated: November 19, 2018

Respectfully submitted,

KREINDLER & KREINDLER LLP

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